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Kerrville, TX 78028  
May 3, 1999

Federal Communications Commission  
Washington, DC 20054

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Gentlemen:

Enclosed is a petition for Rulemaking applicable to Part 97 of the Commission's Rules filed by the Central States VHF Society of which I am the Chairman of the Government Liaison Committee.

Your consideration of the petition will be greatly appreciated. Please address any questions or other correspondence relative to this matter to me at the above address or to my E-Mail address, [btynan@a-omega.net](mailto:btynan@a-omega.net).

Thank you for your consideration of this petition.

Very truly yours,



William A. Tynan W3XO  
Chairman Government Liaison Committee  
Central States VHF Society

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Before the  
**Federal Communications Commission**  
Washington, DC 20054

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Petition for Rulemaking

Request to change Part 97.305 )  
of the Commission's Rules to limit )  
certain types of transmission )  
on prescribed portions of the )  
Amateur VHF and UHF bands )

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Petition Submitted by the  
**Central States VHF Society**

Introduction

The Central States VHF Society (CSVHFS) was formed in 1967 following several years of informal meetings involving Midwest amateurs interested in the VHF and higher amateur bands. Since its formation, the CSVHFS has held annual conferences to present technical papers on the current circuit designs for equipment suitable to the higher frequency bands as well as information on propagation and operation on these bands. Attendance at the conferences averages between two and three hundred people often including people from many states of the U.S., Canada and a number of other countries. While this may not seem to a large number, it represents some of the most active and knowledgeable people involved in weak signal VHF, UHF and microwave operation.

The CSVHFS contends that long haul weak signal work on the bands above 50 MHz is vital to the continued contribution that amateurs can make to the state of the radio communications art. We are concerned that the experimentation necessary to continue to make these contributions is in jeopardy with the increasing encroachment of various kinds of wide band modes such as FM voice and packet into the small portions of the bands where weak signal work customarily takes place. This proposal is intended to head off this problem by limiting the kinds of transmissions permitted in these narrow portions of the VHF and UHF spectrum, while maintaining ample space for use by wider band modes.

Discussion

CSVHFS views with alarm the continuing spread of wide band (FM voice and packet transmissions on the VHF amateur bands, particularly on the 2 meter band. If the type of weak signal operation, in which our members, and many other amateurs engage is to continue; we believe that it must be protected from wide band emissions such as are increasingly popular on the VHF amateur bands - namely FM modulated voice and/or packet transmissions. Band Plans, whether promulgated by a national organization such as ARRL, or other groups, have not proven adequately successful in limiting these wide band modes from the band segments used for weak signal communication. This is why we ask that the Commission institute appropriate Rule changes to more strongly protect the

viability of weak signal communication on the VHF and UHF amateur bands.

The types of modulation techniques used for weak signal VHF work are currently identical to those employed on the HF amateur bands, namely Morse Code CW and SSB voice. However, narrow band data transmission such as now used on the HF bands, and other advanced techniques may also be employed for special experiments. On too many occasions, reception of these narrow band emissions is severely hampered by the presence of wide band FM signals. The CSVHFS contends that the Commission is already aware of such incompatibility between modes and thus has taken steps to protect existing communication techniques on the HF frequencies by its implementation of rules in Section 97.305 limiting the kinds of transmissions on all frequencies below 29 MHz to the emission standards defined in 97.307. We quote these applicable rules:

" (1) No angle-modulation emission may have a modulation index greater than 1 at the highest modulation frequency" and "(4) Only a RTTY or data emission using a specified digital code listed in Section 97.309(a) of this part may be transmitted . The symbol rate must not exceed 1200 bauds, or the frequency shift keying, the frequency shift between mark and space, must not exceed 1 kHz."

CSVHFS contends that these rules regarding the types of transmissions allowed are appropriate and have served amateur radio well. We believe that this is especially true now that most amateur transceivers, sold over the past ten years, include provision for FM transmission. Imagine what 20 meters would sound like if many amateurs decided to switch their transceivers to the FM position! Since the Commission's rules prohibit FM with a modulation index of greater than 1, on those HF bands, this does not happen. However, as noted, weak signal VHF operators using these same modulation techniques as are found on 20 meters (for example). are not afforded such protection, and are beginning to encounter interference from wide band FM operation, simply because it is not prohibited.

#### Proposal

Accordingly, CSVHFS requests a rule change to provide the same freedom from interference caused by wide band modes on certain VHF frequencies as is accorded HF operators on all frequencies below 29 MHz. We ask that between 50.1 and 50.3 MHz, 144.1 and 144.3 MHz, 222.0 and 222.15 MHz and 431.8 and 432.5 MHz the same provision with respect to emission standards be employed as is employed the HF bands below 29 MHz. We believe, however that between 50.0 and 50.1 MHz and 144.0 and 144.1 MHz, the same standards as apply between 28.0 and 28.3 MHz may be applied rather than the more limiting standard applied to the lower HF bands, namely (3) which limits data transmission rates to 300 bauds.

The specific rule changes requested by CSVHFS are contained in Appendix A.

The CSVHFS respectfully asks that the Commission consider this Petition and designate it for a rulemaking proceeding as soon as possible.

Respectfully submitted,

  
Rod Blocksome K0DAS  
President

## Appendix A

### Specific rule changes requested by CSVHFS

#### Sec. 97.305

Wavelength band	Frequencies	Emission type authorized	Standard
6 m	50.0-50.1 MHz	RTTY, data	(4)
	50.1-50.3 MHz	Phone, image, RTTY	(1), (2)
	50.3-54.0 MHz	MCW, phone, image, RTTY	(2), (5)
2 m	144.0-144.1 MHz	RTTY, data	(4)
	144.1-144.3 MHz	Phone, image	(1), (2)
	144.3-148.0 MHz	Phone, image	(2)
1.25 m	222.0-222.15 MHz	Phone, image	(1), (2)
	222.15-225.0 MHz	MCW, phone, image, RTTY, data, test	(2), (6)
70 cm	420.0-431.8 MHz	MCW, phone, image RTTY, Data, ss, test	(6), (8)
	431.8-432.5 MHz	Phone, image	(1), (2)
	432.5-450.0 MHz	MCW, phone, image RTTY, Data, ss, test	(6), (8)

No changes are proposed for frequency segments not listed.